

EXHIBIT K

FINNERTY OSTERREICHER & ABDULLA

ATTORNEYS AT LAW

70 NIAGARA STREET, SUITE 411, BUFFALO, NEW YORK 14202-3407

716-340-2200

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FAX 716-340-2300

KARIM A. ABDULLA
TELEPHONE EXTENSION 225
E-MAIL: kaa@foalegal.com

JOHN H. STENGER
1930-2002

October 21, 2021

Jimmy Toy, Esq.
Assistant General Counsel
Redbubble Inc.
111 Sutter St., 17th Floor
San Francisco, CA 94104

RE: Copyright Infringement, Reg. Copyright No. VA 2-189-607 (Subject: Photograph “*Mister Rogers and Francois Clemmons*,” John H. Beale (1993)) and Reg. Copyright No. VAu 1-401-456 (Subject: Photograph “*Mister Rogers and Francois Clemmons With Child’s Swimming Pool*,” John H. Beale (1993)).

Dear Mr. Toy,

On April 15, 2021, my office, as attorneys for John H. Beale, creator and registered copyright holder of the iconic photographs titled “*Mister Rogers and Francois Clemmons*” and “*Mister Rogers and Francois Clemmons With Child’s Swimming Pool*” (“Photographs” or “Copyrighted Works”), sent to Redbubble correspondence advising of serious and serial violations of Mr. Beale’s intellectual property rights. In that correspondence, we provided Redbubble (“the Company”) with links to reference photographs of the copyrighted works as well as a list of, and links to, over one hundred and fifty infringing products being sold by the Company which incorporated either unlicensed direct copies of the Photographs or unlicensed derivative works. Despite the egregious and blatant violation of Mr. Beale’s intellectual property rights, we also, in good faith, offered to resolve the matter in a reasonable manner.

On May 7, 2021, I received an email response not from the Company’s legal department, but, rather, Redbubble’s “Content Operations Team.” In the email, the Company advised that infringing content had been removed.

However, the May 7 correspondence did not specify what measures, if any, Redbubble had or would be willing to undertake to either remove (or prevent going forward) similarly infringing content, nor did it respond to (or even acknowledge) my client’s settlement demand. Rather, it put the onus on Mr. Beale to engage in a never-ending obligation to constantly search for and identify infringing content, all while Redbubble continued to market, sell, arrange for the production of,

and ultimately profit from, blatant copyright violations. This was, and continues to be, unacceptable.

Indeed, and in fact, and despite being put on notice, we were able to identify additional products being marketed and sold by Redbubble which infringed my client's intellectual property rights. Accordingly, on June 3, 2021, I again wrote to the Company, again advising of our position that the Company's prior and continued use of the Copyrighted Works (and derivatives thereof) constituted, in our view, copyright infringement by the Company in violation and derogation of Mr. Beale's intellectual property rights. I further advised that the Company was continuing to market and sell infringing products despite having been previously put on notice, specifically identifying additional infringing products by again providing links to the specific products.

You responded on June 17, 2021, asserting "[i]t is Redbubble's policy and practice to respect the [intellectual property] rights of others and to provide reasonable assistance to rights holders in this regard." Yet, you placed the blame and responsibility for copyright infringement on the so-called "third-party sellers who take sole responsibility for the images they upload to their profiles and for the printed products they sell to their customers." Indeed, comparing the Company to eBay and Amazon, you went so far as to take the position that "Redbubble itself does not create, own, sell, manufacture, print, promote, ship or distribute any of the images or products sold or offered for sale through our platform."

Your positions, in our view, are insupportable at best, both factually and legally.

Among other things, products being offered for sale are promoted by Redbubble directly, both on Redbubble's website and through emails sent from Redbubble. Sales receipts and order confirmations for items purchased from the Company are sent from Redbubble as are order delivery confirmations, each of which expressly state: "This is an operational email from Redbubble." Redbubble itself provides artists with stock models and a list of predetermined (by Redbubble) products on which an artist's art may be sold. When an item is ordered, Redbubble provides a confirmation page indicating "We're [i.e., Redbubble] on it" and Redbubble – not the artist – informs the customer that the product will be made and shipped, providing an estimated delivery date. Customers are directed to contact Redbubble with any customer service, shipping, or product quality issues. Redbubble, and not the artist, selects the third-party manufacturer/fulfiller to produce the product, which are shipped in Redbubble packaging. Redbubble determines the base price of the product being sold so as to make a profit after accounting for fees, manufacturing costs, and operational costs, and Redbubble is responsible for collecting payment, handling returns, and has discretion with regard to the disposal of returned and unwanted items.

Moreover, and as you are no doubt aware, virtually every court which has been asked to consider the issue has, to date, declined to adopt your position that Redbubble is merely a passive entity which serves merely to connect buyers and sellers. Indeed, and to the contrary, judicial decisions have regularly and routinely rejected this position, holding that at the very least that the Company is not entitled to summary judgment on this basis. *See, e.g., The Ohio State University v. Redbubble, Inc.*, 989 F.3d 435 (6th Cir. 2021); *Atari Interactive v. Redbubble, Inc.*, 515

F.Supp.3d 1089 (N.D. Cal. 2021). And, more recently, as noted in *Y.Y.G.M. SA v Redbubble Inc.*, (see 2021 U.S.Dist. LEXIS 192250 (C.D. Ca., October 5, 2021)), the Company was found liable for contributory infringement. In our view, the basis, rationale, and holding of the case are clearly very favorably to Mr. Beale should litigation ensue, particularly so on the facts of this case given that Redbubble – despite having been specifically advised on several occasions – continues to sell infringing products. *See, e.g.:*

- https://www.redbubble.com/i/t-shirt/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.IJ6L0?utm_source=google&utm_medium=cpc&utm_campaign=g.pla+notset&country_code=US&utm_content=%5bC.382769802%5d%5bAG.27589593522%5d%5bAD.498088454117%5d&gclid=EA1aIQobChMI4bC0e2D8gIVrQn5AB2qMg1xEAEYASABEgLCLvD_BwE
- <https://www.redbubble.com/i/t-shirt/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.UGYPM>
- <https://www.redbubble.com/i/t-shirt/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.121KU>
- <https://www.redbubble.com/i/t-shirt/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.IJ6L0>
- <https://www.redbubble.com/i/t-shirt/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.1YYVU>
- <https://www.redbubble.com/i/hoodie/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.O6XP1>
- <https://www.redbubble.com/i/sweatshirt/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.0LCRC>
- <https://www.redbubble.com/i/long-sleeve-t-shirt/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.SOI2Z>
- <https://www.redbubble.com/i/t-shirt/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.RY32L>
- <https://www.redbubble.com/i/t-shirt/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.6VDG0>
- <https://www.redbubble.com/i/hoodie/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.YFBT8>
- <https://www.redbubble.com/i/sweatshirt/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.LEP2X>
- <https://www.redbubble.com/i/tank-top/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.IXNXQ>
- <https://www.redbubble.com/i/top/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.6AQD3>
- <https://www.redbubble.com/i/t-shirt/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.FB110>
- <https://www.redbubble.com/i/tank-top/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.B4HC7>

- <https://www.redbubble.com/i/t-shirt/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.JZXP1>
- <https://www.redbubble.com/i/t-shirt/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.A5PYK>
- <https://www.redbubble.com/i/hoodie/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.BN4XF>
- <https://www.redbubble.com/i/dress/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.V4WQ8>
- <https://www.redbubble.com/i/top/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.B7P0O>
- <https://www.redbubble.com/i/t-shirt/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.G2CME>
- <https://www.redbubble.com/i/t-shirt/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.EEZDA>
- <https://www.redbubble.com/i/t-shirt/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.CBHAX>
- <https://www.redbubble.com/i/dress/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.TGIUM>
- <https://www.redbubble.com/i/leggings/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.7DWO7>
- <https://www.redbubble.com/i/skirt/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.MUCKM>
- <https://www.redbubble.com/i/t-shirt/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.07KN2>
- <https://www.redbubble.com/i/t-shirt/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.528ON>
- <https://www.redbubble.com/i/sticker/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.EJUG5>
- <https://www.redbubble.com/i/sticker/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.JCQM3>
- <https://www.redbubble.com/i/laptop-skin/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.6EA4Y>
- <https://www.redbubble.com/i/laptop-case/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.2U5KG>
- <https://www.redbubble.com/i/sticker/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.O9UDB>
- <https://www.redbubble.com/i/ipad-skin/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.MHP6F>
- <https://www.redbubble.com/i/ipad-case/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.MNKGf>
- <https://www.redbubble.com/i/iphone-skin/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.62NBT>
- <https://www.redbubble.com/i/iphone-case/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.2A337>

- <https://www.redbubble.com/i/iphone-case/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.E69SZ>
- <https://www.redbubble.com/i/iphone-case/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.BQ7KE>
- <https://www.redbubble.com/i/iphone-case/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.TALA6>
- <https://www.redbubble.com/i/samsung-skin/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.NOJ2U>
- <https://www.redbubble.com/i/samsung-case/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.FUPE7>
- <https://www.redbubble.com/i/samsung-case/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.X4ZCI>
- <https://www.redbubble.com/i/samsung-case/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.WWHTZ>
- <https://www.redbubble.com/i/art-board-print/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.NVL2T>
- <https://www.redbubble.com/i/art-print/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.1G4ZT>
- <https://www.redbubble.com/i/canvas-print/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.56DNM>
- <https://www.redbubble.com/i/canvas-print/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.5Y5V7>
- <https://www.redbubble.com/i/framed-print/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.AJ1A3>
- <https://www.redbubble.com/i/metal-print/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.0JXQP>
- <https://www.redbubble.com/i/photographic-print/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.6Q0TX>
- <https://www.redbubble.com/i/postcard/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.V7PMD>
- <https://www.redbubble.com/i/poster/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.LVTDI>
- <https://www.redbubble.com/i/tapestry/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.ODB3H>
- <https://www.redbubble.com/i/wood-print/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.EZ4MB>
- <https://www.redbubble.com/i/acrylic-block/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.P5BX3>
- <https://www.redbubble.com/i/bath-mat/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.EVFTZ>
- <https://www.redbubble.com/i/clock/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.1X49C>
- <https://www.redbubble.com/i/coasters/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.E5I3N>

- <https://www.redbubble.com/i/comforter/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.UBAD9>
- <https://www.redbubble.com/i/duvet-cover/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.RCGFH>
- <https://www.redbubble.com/i/floor-pillow/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.TMTL5>
- <https://www.redbubble.com/i/shower-curtain/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.YH6LW>
- <https://www.redbubble.com/i/throw-blanket/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.16D0B>
- <https://www.redbubble.com/i/throw-pillow/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.5X2YF>
- <https://www.redbubble.com/i/kids-hoodie/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.7ZOT9>
- <https://www.redbubble.com/i/baby-t-shirt/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.CYEQ7>
- <https://www.redbubble.com/i/kids-t-shirt/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.MZ153>
- <https://www.redbubble.com/i/baby-onesie/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.8RDFY>
- <https://www.redbubble.com/i/baby-onesie/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.P5P5Q>
- <https://www.redbubble.com/i/kids-hoodie/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.BDV8V>
- <https://www.redbubble.com/i/drawstring-bag/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.YT4RK>
- <https://www.redbubble.com/i/tote-bag/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.A9G4R>
- <https://www.redbubble.com/i/backpack/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.K1KHE>
- <https://www.redbubble.com/i/mug/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.9Q0AD>
- <https://www.redbubble.com/i/tote-bag/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.P1QBH>
- <https://www.redbubble.com/i/duffle-bag/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.TZ9LO>
- <https://www.redbubble.com/i/mask/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.6BSL1>
- <https://www.redbubble.com/i/mask/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.9G0D8>
- <https://www.redbubble.com/i/mask/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.F8Y4C>
- <https://www.redbubble.com/i/pin/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.NP9QY>

- <https://www.redbubble.com/i/scarf/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.B15PI>
- <https://www.redbubble.com/i/socks/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.9HZ1B>
- <https://www.redbubble.com/i/mug/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.W3OIY>
- <https://www.redbubble.com/i/mug/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.V33QC>
- <https://www.redbubble.com/i/water-bottle/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.Y6CDO>
- <https://www.redbubble.com/i/pouch/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.440R3>
- <https://www.redbubble.com/i/greeting-card/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.5MT14>
- <https://www.redbubble.com/i/notebook/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.RXH2R>
- <https://www.redbubble.com/i/notebook/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.WX3NH>
- <https://www.redbubble.com/i/jigsaw-puzzle/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.L4Q0T>
- <https://www.redbubble.com/i/apron/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.6ZXWR>
- <https://www.redbubble.com/i/magnet/Mr-R%C3%B3g%C3%A9rs-Officer-Clemmons-Pool-T-Shirts-Novelty-by-FQWJKV/80822351.TBCTK>

Indeed, Redbubble also continues to sell products which not only reproduce the copyrighted work directly, but also clearly and without question include derivative works:

- <https://www.redbubble.com/i/t-shirt/PEACE-BLM-by-harolddean/82203826.240QL>
- <https://www.redbubble.com/i/t-shirt/PEACE-BLM-by-harolddean/82203826.UGYPM>
- <https://www.redbubble.com/i/t-shirt/PEACE-BLM-by-harolddean/82203826.UXNUP>
- <https://www.redbubble.com/i/t-shirt/PEACE-BLM-by-harolddean/82203826.1YYVU>
- <https://www.redbubble.com/i/hoodie/PEACE-BLM-by-harolddean/82203826.CVVWR>
- <https://www.redbubble.com/i/sweatshirt/PEACE-BLM-by-harolddean/82203826.2VJVH>
- <https://www.redbubble.com/i/long-sleeve-t-shirt/PEACE-BLM-by-harolddean/82203826.7TQLX>
- <https://www.redbubble.com/i/t-shirt/PEACE-BLM-by-harolddean/82203826.RY32L>

- <https://www.redbubble.com/i/t-shirt/PEACE-BLM-by-harolddean/82203826.LKP5W>
- <https://www.redbubble.com/i/hoodie/PEACE-BLM-by-harolddean/82203826.31YUG>
- <https://www.redbubble.com/i/sweatshirt/PEACE-BLM-by-harolddean/82203826.WY6W4>
- <https://www.redbubble.com/i/tank-top/PEACE-BLM-by-harolddean/82203826.N283C>
- <https://www.redbubble.com/i/top/PEACE-BLM-by-harolddean/82203826.6AQD3>
- <https://www.redbubble.com/i/t-shirt/PEACE-BLM-by-harolddean/82203826.M4A2N>
- <https://www.redbubble.com/i/tank-top/PEACE-BLM-by-harolddean/82203826.Z81UR>
- <https://www.redbubble.com/i/t-shirt/PEACE-BLM-by-harolddean/82203826.Y4WIZ>
- <https://www.redbubble.com/i/t-shirt/PEACE-BLM-by-harolddean/82203826.OJSDL>
- <https://www.redbubble.com/i/hoodie/PEACE-BLM-by-harolddean/82203826.ZDT2T>
- <https://www.redbubble.com/i/dress/PEACE-BLM-by-harolddean/82203826.V4WQ8>
- <https://www.redbubble.com/i/top/PEACE-BLM-by-harolddean/82203826.B7P0O>
- <https://www.redbubble.com/i/t-shirt/PEACE-BLM-by-harolddean/82203826.GQXYX>
- <https://www.redbubble.com/i/t-shirt/PEACE-BLM-by-harolddean/82203826.APR4B>
- <https://www.redbubble.com/i/t-shirt/PEACE-BLM-by-harolddean/82203826.L1PUX>
- <https://www.redbubble.com/i/dress/PEACE-BLM-by-harolddean/82203826.TGIUM>
- <https://www.redbubble.com/i/leggings/PEACE-BLM-by-harolddean/82203826.7DWO7>
- <https://www.redbubble.com/i/skirt/PEACE-BLM-by-harolddean/82203826.MUCKM>
- <https://www.redbubble.com/i/t-shirt/PEACE-BLM-by-harolddean/82203826.07KN2>
- <https://www.redbubble.com/i/t-shirt/PEACE-BLM-by-harolddean/82203826.HDE8H>
- <https://www.redbubble.com/i/sticker/PEACE-BLM-by-harolddean/82203826.EJUG5>
- <https://www.redbubble.com/i/sticker/PEACE-BLM-by-harolddean/82203826.JCOM3>

- <https://www.redbubble.com/i/laptop-skin/PEACE-BLM-by-harolddean/82203826.6EA4Y>
- <https://www.redbubble.com/i/laptop-case/PEACE-BLM-by-harolddean/82203826.2U5KG>
- <https://www.redbubble.com/i/sticker/PEACE-BLM-by-harolddean/82203826.O9UDB>
- <https://www.redbubble.com/i/ipad-skin/PEACE-BLM-by-harolddean/82203826.MHP6F>
- <https://www.redbubble.com/i/ipad-case/PEACE-BLM-by-harolddean/82203826.MNKGf>
- <https://www.redbubble.com/i/iphone-skin/PEACE-BLM-by-harolddean/82203826.62NBT>
- <https://www.redbubble.com/i/iphone-case/PEACE-BLM-by-harolddean/82203826.2A337>
- <https://www.redbubble.com/i/iphone-case/PEACE-BLM-by-harolddean/82203826.E69SZ>
- <https://www.redbubble.com/i/iphone-case/PEACE-BLM-by-harolddean/82203826.BQ7KE>
- <https://www.redbubble.com/i/iphone-case/PEACE-BLM-by-harolddean/82203826.TALA6>
- <https://www.redbubble.com/i/samsung-skin/PEACE-BLM-by-harolddean/82203826.NOJ2U>
- <https://www.redbubble.com/i/samsung-case/PEACE-BLM-by-harolddean/82203826.FUPE7>
- <https://www.redbubble.com/i/samsung-case/PEACE-BLM-by-harolddean/82203826.X4ZCI>
- <https://www.redbubble.com/i/samsung-case/PEACE-BLM-by-harolddean/82203826.WWHTZ>
- <https://www.redbubble.com/i/art-board-print/PEACE-BLM-by-harolddean/82203826.NVL2T>
- <https://www.redbubble.com/i/art-print/PEACE-BLM-by-harolddean/82203826.1G4ZT>
- <https://www.redbubble.com/i/canvas-print/PEACE-BLM-by-harolddean/82203826.56DNM>
- <https://www.redbubble.com/i/canvas-print/PEACE-BLM-by-harolddean/82203826.5Y5V7>
- <https://www.redbubble.com/i/framed-print/PEACE-BLM-by-harolddean/82203826.AJ1A3>
- <https://www.redbubble.com/i/metal-print/PEACE-BLM-by-harolddean/82203826.OJXQP>
- <https://www.redbubble.com/i/photographic-print/PEACE-BLM-by-harolddean/82203826.6Q0TX>
- <https://www.redbubble.com/i/postcard/PEACE-BLM-by-harolddean/82203826.V7PMD>

- <https://www.redbubble.com/i/poster/PEACE-BLM-by-harolddean/82203826.LVTDI>
- <https://www.redbubble.com/i/tapestry/PEACE-BLM-by-harolddean/82203826.ODB3H>
- <https://www.redbubble.com/i/wood-print/PEACE-BLM-by-harolddean/82203826.EZ4MB>
- <https://www.redbubble.com/i/acrylic-block/PEACE-BLM-by-harolddean/82203826.P5BX3>
- <https://www.redbubble.com/i/clock/PEACE-BLM-by-harolddean/82203826.1X49C>
- <https://www.redbubble.com/i/coasters/PEACE-BLM-by-harolddean/82203826.E5I3N>
- <https://www.redbubble.com/i/comforter/PEACE-BLM-by-harolddean/82203826.UBAD9>
- <https://www.redbubble.com/i/duvet-cover/PEACE-BLM-by-harolddean/82203826.RCGFH>
- <https://www.redbubble.com/i/floor-pillow/PEACE-BLM-by-harolddean/82203826.TMTL5>
- <https://www.redbubble.com/i/shower-curtain/PEACE-BLM-by-harolddean/82203826.YH6LW>
- <https://www.redbubble.com/i/throw-blanket/PEACE-BLM-by-harolddean/82203826.16D0B>
- <https://www.redbubble.com/i/throw-pillow/PEACE-BLM-by-harolddean/82203826.5X2YF>
- <https://www.redbubble.com/i/drawstring-bag/PEACE-BLM-by-harolddean/82203826.YT4RK>
- <https://www.redbubble.com/i/tote-bag/PEACE-BLM-by-harolddean/82203826.A9G4R>
- <https://www.redbubble.com/i/backpack/PEACE-BLM-by-harolddean/82203826.K1KHE>
- <https://www.redbubble.com/i/mug/PEACE-BLM-by-harolddean/82203826.9Q0AD>
- <https://www.redbubble.com/i/tote-bag/PEACE-BLM-by-harolddean/82203826.P1QBH>
- <https://www.redbubble.com/i/duffle-bag/PEACE-BLM-by-harolddean/82203826.TZ9LO>
- <https://www.redbubble.com/i/mask/PEACE-BLM-by-harolddean/82203826.6BSL1>
- <https://www.redbubble.com/i/mask/PEACE-BLM-by-harolddean/82203826.9G0D8>
- <https://www.redbubble.com/i/mask/PEACE-BLM-by-harolddean/82203826.F8Y4C>
- <https://www.redbubble.com/i/pin/PEACE-BLM-by-harolddean/82203826.NP9QY>

- <https://www.redbubble.com/i/scarf/PEACE-BLM-by-harolddean/82203826.B15PI>
- <https://www.redbubble.com/i/socks/PEACE-BLM-by-harolddean/82203826.9HZ1B>
- <https://www.redbubble.com/i/mug/PEACE-BLM-by-harolddean/82203826.W3OIY>
- <https://www.redbubble.com/i/mug/PEACE-BLM-by-harolddean/82203826.V33QC>
- <https://www.redbubble.com/i/water-bottle/PEACE-BLM-by-harolddean/82203826.Y6CDO>
- <https://www.redbubble.com/i/pouch/PEACE-BLM-by-harolddean/82203826.440R3>
- <https://www.redbubble.com/i/greeting-card/PEACE-BLM-by-harolddean/82203826.5MT14>
- <https://www.redbubble.com/i/notebook/PEACE-BLM-by-harolddean/82203826.RXH2R>
- <https://www.redbubble.com/i/notebook/PEACE-BLM-by-harolddean/82203826.WX3NH>
- <https://www.redbubble.com/i/magnet/PEACE-BLM-by-harolddean/82203826.TBCTK>

See also <https://www.redbubble.com/i/t-shirt/An-Officer-and-A-Man-Sitting-Together-by-beend1991/77834164.S7RYU> (which indicates that this image is being sold on Redbubble’s “Classic T-Shirt” as well as more than 92 other products.

In your correspondence, you offer RedBubble’s “proactive screening program,” suggesting that if provided with objectionable images, Redbubble will be able to search for and automatically remove infringing products, thus obviating (or reducing) the need for Mr. Beale to constantly monitor Redbubble for infringing products. However, Redbubble has been in possession of such information since April; that it continues to sell infringing products and/or allow artists to upload infringing art is, in a word, unconscionable. Having been placed on notice numerous times, there is simply no excuse for the Company to have not already implemented proactive screening.

All of these listed products are identical to those which Redbubble has previously been advised violate Mr. Beale’s intellectual property rights. In the circumstances, it is our view that the Company’s conduct is, at this juncture, nothing short of willful, and we believe that a court of competent jurisdiction and/or jury, if needed, will agree. To that end, we expect – and hereby demand – that Redbubble immediately seek to preserve all records (including electronically stored information) pertaining to all products which include images that infringe on Mr. Beale’s intellectual property rights. This includes, but is not limited to artist information, sales data, product cost information, and profits. (Given the sheer number of infringing products, it is expected that discovery in the event of litigation will be extensive and time-consuming; thus I

believe it is appropriate that the Company is given adequate notice of the types of records that will be sought.)

Mr. Beale remains willing to explore resolving what is clearly a repeated and flagrant violation of his intellectual property rights without litigation and as outlined in our initial correspondence. Please be advised that in the event of litigation, the settlement proposed by Mr. Beale will be withdrawn, and Mr. Beale will seek all available damages as well as attorney's fees.

While you consider and formulate a response, the Company will be expected to use the proactive screening program to affirmatively seek out, scrub/remove from the website, and discontinue sales of all products that include images similar to the above and as previously identified in my earlier correspondence. Failure to do so will be presented as further evidence of willful violation on the part of the Company.

I appreciate your prompt attention and cooperation in this very serious matter.

Very Truly Yours,

A handwritten signature in black ink, appearing to read "Karim A. Abdulla", written over a horizontal line.

Karim A. Abdulla